



IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
TEXAS

JOAN GRACE HARLEY, WHITNEY
KOHL JOHN GUNTER JR, JOAN
GRACE HARLEY, CHRIS SEVIER
Plaintiffs

V.

GREG ABBOTT, in his official capacity
as Governor of Texas, KEN PAXTON, in
his capacity as Attorney General, JOHN
F. WARREN, in his official capacity as
the Clerk of Dallas County
Defendants

317 - CV3073-L

Case No:

COMPLAINT FOR INJUNCTIVE
RELIEF

JURY DEMAND

**DECLARATION OF REVEREND JOAN GRACE HARLEY A SELF-ASSERTED
POLYGAMISTS**

I, Joan Grace Harley, declare under the penalty of perjury, pursuant to 28 USC sec. 1746 as follows:

1. I am over 18. I am a 65
2. I am African American. I was transgender for 18 years. I have left that behind and am now a Reverend, having converted to a new sex-based self-asserted identity narrative.
3. My Grandad was a pastor.
4. When I was three I moved from Washington D.C. to South Carolina.
5. I grew up admiring women. My father really wanted to have a son. And this was made known in our family. I felt like to win my father's affection and approval, I would try to be the son he did never had. I was a tomboy. I would feed the pigs and work on trucks. Things like that.

6. Growing up, I always felt different. I had an older sister who was girly. The rest of my family was light skinned and I was dark skinned. Back then, it mattered. So I just did not feel like I fit in anywhere. I suffered from feelings of rejection that I internalized. I felt inferior.

7. My father promised by my mother that our family would move up North where her family was. But he never made good on that promise, and he remained in the South. My mother decided to move back to Washington where her family was located. They remained married, and I would travel back and forth to be with both. I lacked a feeling of permanency.

8. From around age 13, I became sexualized. I had a boyfriend but was not really attracted to men at the time. I had two children and became a single mom early on.

9. I then started working as a nurse, security guard, and then working in film.

10. One night, ABC News decided to put on a nightly series about alternative lifestyles in the D.C. area called the 1,2,3,4,5. I decided to watch every night. Each night the topic was on homosexuality. I did not know any homosexuals. But something inside me clicked, and I decided that because I felt different I must be a homosexual in light of the truth claims floated by the programming. The program was preaching the idea that a man could be trapped in a woman's body. I accepted that assumption on faith and decided it must be true for me. Basically, the ABC news program was nothing short of a televangelist proselytizing the homosexual orthodoxy that flows from the church of postmodern, western, expressive individualism, and moral relativism. If I did not watch that News program, I might never have become transgender.

10. After watching the program, I went into my closet and picked out the most masculine thing I could find. I started dressing like a man. I went to my first gay bar like I owned the place. My odyssey began. I went from Joan the woman to Joe the man.

11. As a transgender, I looked like Michael Jackson. I wasn't overly masculine or feminine.

12. I married a woman in 1978. We divorced, and my former wife became a Christian and return to me and implored me to leave the gay lifestyle and become a Christian. I was appalled by her suggestion and could not believe she would make it. I could not believe that my former wife would try to convince me that I was not really a man trapped inside a woman's body like the LGBTQ community preached.

13. In 1992, I was living with a woman, but I started to feel like I had bought into a false lie. I started to feel that I should get out of the unfulfilling transgender lifestyle. I was crying and suffering because I felt like I was in a trap of my own making. I felt cheated and lied to. I was sexually dead. I broke up with my girlfriend on August 19, 1992, Bill Clinton's birthday. In September of 1992, I developed strong feelings for men. My countenance begin to physically change as I started to try to get closer to the God of the Bible and shape my life according to his will. My heart changed. There is no question that sexuality is not based on immutability and that sexuality is fluid.

14. Since August 19, 1992, I haven't had a dream or any desire for women. I felt like I wasted 18 years of my life on the false promises floated out of the transgender and LGBT church. For the past 25 years, I have had no desire to be with a woman. I feel regret about my years spent as a transgender but I am glad to know that I am redeemed and in relationship with a perfect Heavenly father who accepts me as I am designed.

15. Just before leaving the transgender lifestyle behind I had a dream where Jesus told me that I would be an ambassador for him someday. In 1997, I decided to become a Reverend.

16. Since leaving the transgender and LGBT community, I have been outspoken and vocal about the dehumanizing and destructive truth claims promoted by the LGBTQ community. I can attest that homosexuality is absolutely a religion. It is a series of unproven faith based assumptions and naked assertions that are implicitly religious. The Government must treat the LGBTQ and transgender truth claims as religious suppositions.

17. Having been an LGBTQ insider for 18 years, I can attest that the LGBTQ church seeks to use government to enshrine its orthodoxy so that its congregational members will feel less ashamed and inadequate about their life style that goes against the way we are and the way things are.

18. After leaving the church of LGBTQ and converting to a new identity narrative, I have been very outspoken about the lies promoted by that faith. Consequently, I have been subjected to insult, threats, bullying, and persecution and the fear that it will continue. I'll go on a radio show and subsequently worry that someone will come and shoot up my house or mess with my car.

My existence to the gay and transgender community constitutes a strong threat because it exposes the lies at the heart of their religion. But like the Constitution and its master narrative of the New Testament Gospel, I am an ambassador of the truth, and I must tell the truth because the truth sets people free, and I deeply love people as the God of the Bible first loved me. I have been redeemed, and I want others who are in the gay lifestyle to know that they can be redeemed as well.

19. My story - alone - proves that homosexuality and transgenderism is not based on immutability whatsoever. Sexual orientation is not a suspect class for purposes of the equal protection and substantive due process clause of the 14th amendment. And allow me to say with convincing clarity as an African American female that I am appalled that the government of

these United States would allow the LGBTQ falsely equate the fake gay civil rights movement to the legitimate raced based civil rights movement of the 1960s lead by Dr. King. I can attest that to falsely equate gay rights based on sexual orientation to race rights based on something as inconsequential as skin tone is an act of fraud and racial animus that manages to be both sexually and racially exploitative.

20. Once I went to an LGBTQ event to speak out about leaving the lifestyle and LGBTQ religion behind, a police officer used unauthorized physical force to remove me from that event. It was traumatic. I was exercising my free speech rights and telling my story. The government's impressible legal recognition of gay marriage has made not just homosexuals but anyone who is pro-gay feel entitled to oppress, marginalize, intimidate, and bully anyone who dares believes that homosexuality is immoral, obscene, and subversive to human flourishing - which it categorically is. The government's invalid legal recognition of homosexual orthodoxy has closed minds and ended debates, while posing a threat to all ex gays and persons of religious conviction. The reason why moral relativist are so determined to stifle those of us who are on the side of the truth is because they have based their entire identity on the idea that truth is merely a man made convention, when people like myself prove that it is not. They want to remain and promote the darkness. Persons of religious convictions are naturally in a position of danger if the government is telling moral relativist that their ideology is beyond dispute - when my testimony and personal experiences demonstrate insurmountably that homosexuality and transgenderism is not based on immutability whatsoever and that any prior court that stated otherwise is lying to the American public.

21. As a former insider on the gay and transgender community, I am very concerned about children. The fact that the government has legitimized homosexual religious orthodoxy and dogma, those who are pro-gay feel entitled to recruit and convert minors to the homosexual lifestyle - sexualizing them at an early age. The government's endorsement of gay marriage promotes obscenity, erodes community standards of decency, normalizes false permission giving beliefs about sex, and interferes with consent. The government's wrongful recognition of homosexual doctrine is subjecting minors to sexual exploitation.

22. I now sua sponte self-identify as a polygamist and want to marry Mr. Gunter and Mrs. Kohl in step with any personal, individual, existing, and fundamental rights I may be entitled to at present.

23. If gays have the right to legally marry and receive state benefits, I would like to marry two people on that same legal basis.

24. Polygamy, like homosexuality, is merely one denominational sect within the overall church of moral relativism. I want those who are in a gay marriage to have the same legal recognition as those of us who want to enter into a polygamous marriage - even if it means that neither sex-based identity narrative is legally recognizable for being religious and not secular. As a self-identified polygamists, it is deeply offensive that gay marriage is legally recognized but man-multi-person marriage is not. I join the Plaintiffs in their demand that the Court allow all individuals to marry as a matter of civil rights or that the Court enjoin the state from legally recognizing any form of marriage beyond neutral, fact-based, self-evident, natural, neutral, non-controversial marriage as defined by the secular dictionary and civilizations for millennia between one man and one woman.

25. I understand and acknowledge that man-multi-person marriage is as equally controversial as man-man and woman-woman marriage, but I do not think that man-woman marriage is controversial but self-authenticating, just like the Bill of Rights and Constitution themselves.

A handwritten signature in cursive script, reading "Joan Grace Harley". The signature is written in dark ink and includes a stylized flourish at the end.

Joan Grace Harley